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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

**BROTHERHOOD MUTUAL
INSURANCE COMPANY, as Subrogee
of GRACE COMMUNITY CHURCH OF
RENO**

Plaintiff.

V.

**ASPEN PUMPS; and DOE
DEFENDANTS 1-10,**

Defendants.

| Case No.: 3:24-CV-00037-ART- CSD

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
PROPOSED JOINT PRETRIAL
ORDER**

(SECOND REQUEST)

1 IT IS HEREBY STIPULATED AND AGREED between Plaintiff Brotherhood
 2 Mutual Insurance Company (“Brotherhood” or “Plaintiff”) and Defendant Aspen Pumps,
 3 Inc. (“Aspen Pumps” or “Defendant”) (collectively the “Parties”), by and through their
 4 counsel of record, pursuant to LR 7-1, LR IA 6-1, and LR IA 6-2, that the parties shall have
 5 addition time to draft and file the Proposed Joint Pretrial Order (“JPTO”) up to and
 6 including August 4, 2025.

7 On May 20, 2025, the Court entered its Order Denying Plaintiffs’ Motion in Limine
 8 to Exclude Defendant’s Experts as well as Plaintiff’s Motion for Summary Judgment and
 9 granting in part Defendant’s Cross-Motion for Summary Judgment [Dkt. 1]. Pursuant to LR
 10 26-1, the Court’s May 20, 2025 Order triggered the parties’ first deadline to file their
 11 JPTO—June 20, 2025. Subsequently, the Court granted the parties’ Stipulation and Order
 12 to Extend Deadline to File Proposed Joint Pretrial Oder (First Request) (Document Nos. 69
 13 [Stipulation, unsigned by the Court] and 70 [Stipulation, with Order signed by the Court]).

14 Since then, the parties have continued to confer and work towards the finalization of
 15 the JPTO. However, the parties are in need of additional time to finalize their respective
 16 exhibit lists and to confer regarding objections to their respective exhibits. Further, the
 17 parties are still working to finalize their deposition designations and objections thereto.
 18 Further, and most triggering of the need for additional time, the parties are working
 19 diligently to ensure mutual availability for proposed trial dates, but the parties have been
 20 unable to ensure mutual calendar availability for all relevant parties, counsel and expert
 21 witnesses. The parties expect that another 14 days will be sufficient to finalize the
 22 outstanding issues.

23 The parties have circulated working drafts of the JPTO to each other, and are nearing
 24 finalization of a mutually agreed version, and agree there appears to be no dilatory motive
 25 from counsel or parties on either side of this case.

26 Accordingly, the parties now respectfully propose to extend the filing of the JPTO
 27

1 by approximately two weeks, up to and including August 4, 2025. Good cause exists for
 2 the extension set forth herein. This is the second request for an extension of this deadline
 3 and is not intended to cause any delay.

4 This stipulation is submitted for the limited purpose of extending the above deadline
 5 and is without prejudice to any parties' rights, especially given that there is no trial date
 6 currently set in this matter.

7
 8 IT IS SO STIPULATED
 9

10 DATED: July 21st, 2025
 11

12 **LAXALT LAW GROUP**

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 28 *Attorneys for Defendant*

ORDER

This Court, having reviewed and considered the Stipulation by the parties, and Good Cause Appearing therefore, the deadline for the Proposed Joint Pretrial Order is hereby extended as agreed to by the parties to August 4, 2025.

IT IS SO ORDERED.

DATED this 21st day of July, 2025.

UNITED STATES MAGISTRATE JUDGE

BAKER & HOSTETLER LLP
DENVER
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